

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
MOUNTAIN EXPRESS OIL COMPANY, et al.,	§	Case No. 23-90147 (DRJ)
	§	
Debtors.	§	(Jointly Administered)
	§	
	§	<u>Hearing Date:</u> August 18, 2023
	§	<u>Hearing Time:</u> 3:30 p.m. (CST)
	§	<u>Location:</u> United States Courthouse
	§	Courtroom 400, 4th Floor
	§	515 Rusk
	§	Houston, Texas 77002
	§	Judge Presiding: David R. Jones

BFM'S COMBINED WITNESS AND EXHIBIT LIST

Brothers Lapalco, LLC, Brothers Avondale LLC, Carol Sue Investments, LLC, Manhattan HSI Investments, LLC, Ames Investments No. 2, LLC, and Manhattan Place, LLC (collectively, “***BFM***”) submit the following combined Witness and Exhibit List for the electronic hearing scheduled on **August 18, 2023, at 3:30 p.m. (CST)**, before the Honorable David R. Jones, United States Bankruptcy Judge.

WITNESS LIST

1. Craig V. Peters, Chief Financial Officer, BFM Operations LLC
2. Any witness designated or called by any party; and
3. Any witness required for rebuttal.

EXHIBIT LIST

Exhibit No.	Description	Offered	Objection	Admitted	Disposition After Hearing
1	Lapalco Lease and Amendments (9 pages)				
2	Avondale Lease and Amendments (9 pages)				
3	Carol Sue Lease of Commercial Property (Triple Net) and Amendments (16 pages)				
4	1600 Manhattan Lease and Amendments (33 pages)				
5	Westbank Commercial Lease (Triple Net) and Amendments (58 pages)				
6	Manhattan Office Lease (23 pages)				
7	Lapalco Tenant Ledger (1 page)				
8	Avondale Tenant Ledger (1 page)				
9	Carol Sue Tenant Ledger (1 page)				
10	1600 Manhattan Tenant Ledger (1 page)				
11	Westbank Tenant Ledger (1 page)				
12	Manhattan Office Tenant Ledger (1 page)				
13	Lapalco Canopy Picture				
14	Lapalco Canopy Picture 2				

15	Avondale Canopy Picture				
16	Avondale Canopy Picture 2				
17.	Avondale Gas Pump Picture				
18.	Carol Sue Canopy Picture				
19.	Carol Sue Gas Pump Picture				
	Any rebuttal or impeachment exhibits.				
	Any demonstrative exhibits.				
	Any exhibit identified or offered by any other party				
	Any pleadings or exhibits previously filed on the Court's docket.				

BFM reserves the right to modify, amend, or supplement this Witness and Exhibit List at its discretion at any time prior to hearing on these matters.

Dated: August 17, 2023.

Respectfully submitted,

/s/ Omer F. Kuebel, III

Omer F. Kuebel, III

Federal Bar No. 32595

Louisiana State Bar No. 21682

LOCKE LORD LLP

601 Poydras Street, Suite 2660

New Orleans, Louisiana 70130

Telephone: (504) 558-5155

Facsimile: (504) 558-5200

rkuebel@lockelord.com

Philip G. Eisenberg
Texas Bar No. 24033923
Simon R. Mayer
Texas Bar No. 24060243
LOCKE LORD LLP
600 Travis St., Suite 2800
Houston, TX 77002
Telephone: (713) 226-1200
peisenberg@lockelord.com
simon.mayer@lockelord.com

Attorneys for BFM

Certificate of Service

I certify that, on August 17, 2023, a true and correct copy of the foregoing Exhibit and Witness List and the corresponding exhibits were served on all parties who receive service in this jointly administered chapter 11 cases via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Simon R. Mayer

Simon R. Mayer